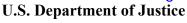
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United States Attorney Southern District of New York

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June 26, 2020

## BY ECF

The Honorable Lorna G. Schofield United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: United States v. Joseph Bagaglia, 19 Cr. 342 (LGS)

Dear Judge Schofield:

The Government respectfully submits this letter, with consent from defense counsel, requesting an adjournment of the status conference currently scheduled in this case for Tuesday, June 30, 2020, at 11 a.m. The Government and the defendant are currently engaged in discussions regarding a pretrial disposition in this case, and those discussions have been delayed by the ongoing pandemic and will not be resolved by the next scheduled status conference date. Accordingly, the Government requests that the status conference be adjourned an additional 60 days to allow the parties to continue their discussions. Furthermore, the Government, for the same reasons, moves, with consent from defense counsel, to exclude time under the Speedy Trial Act until the next scheduled status conference.

Application Granted. The status conference currently scheduled for June 30, 2020 is adjourned to **September 3 2020 at 11:15 a.m.** For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and September 3, 2020 outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h) (7)(A). It is hereby ORDERED that the time between today and September 3, 2020 is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 32.

Respectfully submitted,

AUDREY STRAUSS Acting United States Attorney

by:

Sarah L. Kushner

Assistant United States Attorney

(212) 637-2676

Dated: June 26, 2020 New York, New York

> LORNA G. SCHOFIELD United States District Judge